Remarks

<u>Claims Objections and 35 U.S.C. §101 and §112.</u>

Claim 74 has been corrected to add the wording at the end thereof that was inadvertently omitted when filing the previous response.

<u>35 U.S.C. §103(a)</u>

Each of the independent claims presently on file has been amended in the same fashion. Therefore, taking claim 30 by way of example for all such claims, it will be noted that claim 30 as amended generally comprises a combination of former claims 30 and 31 with the further limitation clarifying that the data format of the first data network is a *packet* data format (which is different to the TDM format used in the external TDM network).

It is noted that the Examiner considers that the subject matter of former claim 31 would have been obvious having regard to the combination of admitted prior art 'APA', Somasundaram (US2006/0013209) and Munoz (US6741585).

Applicant respectfully disagrees that this combination of references would, not just could, lead one of ordinary skill in the art to the claimed arrangement.

Munoz clearly and unambiguously teaches that for PSTN (TDM format) to ATM (packet data format) inter-working, the TDM interface is located at the interface of the PSTN network to the ATM network. This is, of course, the logical place to locate the TDM interface given its function of converting TDM frames or the like to ATM packets and vice-versa. It would be illogical to place the TDM interface taught by Munoz at any other location in the network system because this would create problems of how to convey traffic to be converted from TDM to ATM format (or vice-versa) away from the natural location to perform such conversion to a new location for the TDM interface without any apparent benefit to compensate for the newly created problems. One of ordinary skill in the art simply would not be motivated to

locate, nor seriously contemplate locating, the TDM interface of Munoz to any location other than the junction of the PSTN network and the ATM network.

Consequently, one of ordinary skill in the art, faced with the APA modified as contended by the disclosure of Somasundaram, would locate the TDM interface taught by Munoz at the interface of the second data network (the carrier network of figure 2 of APA) and the external TDM network (the PSTN of figure 2 of APA), i.e. in addition to, or partially replacing TDM to packet data conversion functions of, the trunk gateways 38 depicted in figure 2 of APA. As a consequence, the combined system resulting from the combination of APA, Somasundaram and Munoz would still require at least media proxies 42 in the second data network (the carrier network) and would result in an arrangement quite different to that as now claimed. In fact, the arrangement resulting from the combination of APA, Somasundaram and Munoz would still require some of the functionality of the trunk gateways 38 of APA.

In contrast to the contended combination, in the claimed invention as defined by amended claim 30, the VPN converter is defined as interfacing directly the first data network (VPN data network of figure 3 of the present application) to the external TDM network (PSTN network of figure 3), and interfacing the first data network to the second data network (the carrier network of figure 3). The VPN converter acts as a common interface point between the first data network and the external TDM network and between the first data network and the second data network thereby negating the need to have a packet data format to TDM format conversion means (TDM interface) at the interface between the second data network and the external TDM network. These distinctions are significant. One advantage of the claimed arrangement is that there is no need for any media proxies to be included in the second data network (the carrier network) in contrast to the arrangement resulting from the combination of APA, Somasundaram and Munoz which still requires media proxies in the second data network (the carrier data network). Furthermore, the location of the VPN converter which is, in effect, co-located with the VPN gateway makes the call server operation much more efficient because the VPN converter negates the need for media proxies in the second data network (the carried data network) and thus enables the call server to set up 'direct' connections between entities in the VPNs (private address packet data environment) to entities in the

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PSTN (TDM environment) without the intermediary of media proxies to interface the connections in the carrier data network.
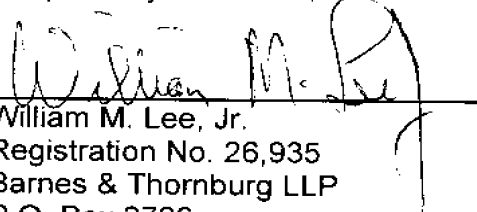
The claimed arrangement is therefore much more efficient in operation than that which would result from the prior art teachings and requires less equipment. Furthermore, it removes the need for entities in private VPN networks to have to rely on complex addressing equipment (media proxies) in another entity's network (the network of the carrier) and effectively relocates the functions necessary to make 'direct' connections to a first data network which the private entities may control such as a corporate enterprise network. This has service and other cost saving implications for the corporate enterprise operator which cannot possibly be realized by the arrangement resulting from the combination of APA, Somasundaram and Munoz.

Given the claim changes to reflect the above, this after final response is also being filed as part of a request for continued examination.

Favorable reconsideration of this application is therefore respectfully solicited. A Power of Attorney to the undersigned will be filed very soon, if not filed concurrently.

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Respectfully submitted,

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